

ENENSTEIN RIBAKOFF LAVIÑA & PHAM

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Robert A. Rabbat, Esq. (NSB # 12633)

David Z. Ribakoff (*pro hac vice*)

3960 Howard Hughes Parkway, Suite 280

Las Vegas, NV 89169

Telephone: (702) 468-0808

Facsimile: (702) 920-8228

Email: rrabbat@enensteinlaw.com

dribakoff@enensteinlaw.com

Attorneys for Plaintiff Park Central Plaza 32, LLC

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEVADA**

In re:

PARK CENTRAL PLAZA 32, LLC;

Debtors.

CASE NO. BK-S-11-14153-BTB

Chapter 11

**PLAINTIFF'S STATEMENT UPON
AMENDED NOTICE OF
REMOVAL PURSUANT TO FED.
R. BANKR. P. 9027(e)(3)**

PARK CENTRAL PLAZA 32, LLC;

Plaintiff,

v.

GREENBERG TRAURIG, LLP; and BOB
L. OLSON;

Defendants.

**ADVERSARY PROCEEDING NO.
14-01096**

In accordance with Federal Rule of Bankruptcy Procedure 9027(e)(3) and Local Rule 9027.1, Plaintiff Park Central Plaza 32, LLC, by its undersigned attorneys, hereby responds to the allegations in the Amended Notice of Removal, dated August 19, 2014, filed by Defendants Greenberg Traurig, LLP, and Bob L. Olson ("Defendants"), without consenting to removal, as

1 follows:

2 1. Plaintiff denies the allegation that the causes of action removed from the Nevada
3 Eighth Judicial District Court Case No. A-14-701605-C styled *Park Central Plaza 32, LLC, v.*
4 *Greenberg Traurig, LLP, et al.* (the “State Court Action”) are core proceedings. Plaintiff does
5 not consent to entry of a final order or judgment by the United States Bankruptcy Court. All
6 claims and causes of action asserted in the State Court Action are claims arising under Nevada
7 state law. All claims are unrelated to Park Central Plaza 32, LLC’s bankruptcy case and will
8 have no conceivable effect on any bankruptcy estate.

9 2. Plaintiff denies the factual allegations contained in the Notice of Removal, but
10 such allegations are in any event irrelevant to a determination of whether the claims are core or
11 non-core.

12 3. Plaintiff expressly reserves all of its rights and remedies with respect to the State
13 Court Action, including but not limited to, the right (i) to trial by jury, (ii) to contest the
14 jurisdiction of the United States District Court or the Bankruptcy Court with respect to the State
15 Court Action or any aspect of it, (iii) to seek remand of the State Court Action to the Nevada
16 Eighth Judicial District Court, Clark County, and/or (iv) to seek such other and further relief as
17 may be appropriate. Plaintiff does not consent to the conduct of a jury trial by the Bankruptcy
18 Court.

19 4. This statement is signed pursuant to Federal Rule of Bankruptcy Procedure 9011.

20
21 Respectfully submitted,

22 Dated this 27th day of August, 2014.

23 /s/ Robert A. Rabbat
24 **ENENSTEIN RIBAKOFF LAVINA &**
25 **PHAM**
26 Robert A. Rabbat, (NSB # 12633)
27 David Z. Ribakoff (*pro hac vice*)
28 3960 Howard Hughes Parkway, Suite 280
Las Vegas, NV 89169

*Attorneys for Plaintiff Park Central Plaza
32, LLC*